

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 23, 2022

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On behalf of the Plaintiffs' Executive Committees, and with the consent of the Kingdom of Saudi Arabia and Dallah Avco, we write to respectfully request that the Court afford the plaintiffs until Tuesday, June 28, 2022, to respond to the Kingdom of Saudi Arabia's letter filed at ECF No. 8131, proposing schedules for, *inter alia*, a renewed motion to dismiss and the parties' *Daubert* motions. The additional time is necessitated due to the ongoing deposition schedule of five expert witnesses (including on June 22, 23, 27 and 29), in which a number of the plaintiffs' counsel are engaged, as well as a number of other professional and personal commitments.

Counsel for Saudi Arabia and Dallah Avco have indicated that the proposed schedule is acceptable and have asked that the Court set Friday, July 1, 2022, as the deadline for reply briefing, to which plaintiffs are agreeable.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haeefe

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF